Water Plan comments from WateReuse California

Dave Smith [dsmith@watereuse.org]
Sent: Monday, November 18, 2013 6:06 PM

To: DWR CWP Comments

Attachments: Governors Letter SB 322.pdf (19 KB)

Thank you for the opportunity to comment. In the spirit of seeking the most practicable and effective Water Plan possible, we offer the following comments:

- Objective 2.3.3 The intent of the recommended evaluation to better align recycled water use in agriculture and environmental applications to create more opportunities for recycled water use and reduce the energy required to produce recycled water is unclear. Many aspects of current non-potable reuse regulations need to be updated to reflect advances in treatment technology and health sciences. Governor Brown's signing message for SB 322 (attached) is quite clear that the pace of developing recycled water regulations needs to be accelerated. This objective should be revised to recommend a review and update of non-potable regulations as appropriate, and focus on use of fit-for-purpose water.
- Objective 2.3.4 We support the stated objective, which is to consider of potential groundwater degradation issues and coordinate with Salt and Nutrient Management Plan implementation. However, this objective should not be associated with recycled water alone, as many waters and practices can degrade groundwater. This objective be deleted from Objective 2 and incorporated into Objective 4 ("Protect and Restore Surface Water and Groundwater Quality").

Thank you

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OFFICE OF THE GOVERNOR

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To the Members of the California State Senate:

I am signing SB 322 which requires the Department of Public Health in consultation with the State Water Resources Control Board, to investigate the feasibility of developing uniform water recycling criteria for direct potable reuse by September 2016.

This information is past due. In an effort to enhance the use of recycled water, I have proposed the consolidation of the management of the drinking water program and all other water quality programs, including recycled water, under the State Water Board.

I am directing the Water Board to ensure that this work is completed expeditiously. The 3-year time frame mandated in this bill is too slow. California needs more high quality water and recycling is key to getting there.

Sincerely,

Edward G. Brown Jr. Blow